

Application Ref:KCC/FH/0076/2025

Proposal: Section 73 application to vary Conditions 3, 21, 25 and 27 of planning permission SH/08/124

Otterpool Quarry, Ashford Road (A20), Sellindge, Kent TN25 6DA

Sellindge Parish Council continues to object to the above Section 73 application. We recognise the existence of waste planning permission at this site but we still believe that the proposed variations would result in material changes to the nature of the permitted operations, with consequential impacts that have not been adequately assessed.

Material Change in Operational Character

The application seeks to introduce “25,000 tonnes per annum of black bag / household waste”, which represents approximately one third of the total permitted throughput.

While the caps remain numerically unchanged, “planning impact is not determined solely by tonnage”. Black bag waste differs materially from other waste streams in terms of odour generation, bioaerosols, pest attraction, dwell times, and fire risk.

Odour Impact and Over-Reliance on Environmental Permitting

The applicant accepts that the proposed changes will result in an increase in odour, describing it as “minor”, yet no updated odour modelling has been submitted.

References in the submission to nearby receptors being “desensitised”, an assumption that is not supported by evidence and fails to reflect the increasing recreational and residential sensitivity of the area.

Highway Safety and Risk of HGV Queuing on the A20

Sellindge Parish Council remains extremely concerned about the risk of HGV queuing and highway safety on the A20.

The site layout drawing confirms that only “nine HGV parking spaces” are provided within the operational area. The agent acknowledges a morning peak in vehicle movements, stating - “It is acknowledged that there would be a peak in vehicle movements departing the site at 07:00”.

Despite this, no enforceable HGV queue management or overflow strategy has been proposed. Any queuing on the A20 would present a serious safety risk due to traffic speeds and the road’s strategic function.

Failure to Properly Assess Cumulative Impacts with Otterpool Park

When permission SH/08/124 was originally granted, Otterpool Park had not been proposed. The agent now relies on historic highway and amenity assessments, stating that -"KCC Highways have been consulted on this planning application and conclude that the application 'will not have a material impact on the local highway network'" .

Sellindge Parish Council considers it unsound to assess this application in isolation, given the transformation of the A20 corridor into a primary residential route serving a new garden settlement.

Fire Suppression Infrastructure and Environmental Risk

The proposal replaces three previously approved tanks with a single "500m³ fire suppression tank", described as- "more efficient water discharge as the site's fire suppression system".

Sellindge Parish Council recognise the importance of fire safety, but we continue to have concerns regarding potential contaminated firewater run-off, failure scenarios, and visual impact. No site-specific Fire Prevention Plan has been submitted alongside the application, limiting meaningful public and planning scrutiny.

Ecology

The updated badger walkover survey confirms that -"Sett 1 continues to be an active main sett, and confirmed in current use". The report also notes access limitations to parts of the site due to dense vegetation. Sellindge Parish Council considers that incremental operational changes risk eroding ecological buffers over time.

Sellindge Parish Council therefore requests that the application be "refused", or alternatively deferred pending the submission of:

Robust odour assessment specific to black bag waste

Cumulative traffic and amenity assessment incorporating Otterpool Park

Enforceable HGV queue management measures

Greater transparency on fire prevention and environmental safeguards